

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF LOUISIANA
MONROE DIVISION**

JILL HINES, et al.,

Plaintiffs,

v.

ALEX STAMOS, et al.,

Defendants.

Case No. 3:23-cv-00571-TAD-KDM

**PLAINTIFFS' CONSENT MOTION FOR EXTENSION OF TIME TO FILE
RESPONSES TO DEFENDANTS' MOTIONS TO DISMISS AND TO COMPEL
ARBITRATION AND TO FILE FIRST AMENDED COMPLAINT AS OF RIGHT**

Pursuant to the Federal Rules of Civil Procedure and this Court's Local Rules, Plaintiffs respectfully request the Court's leave for an extension of time of 21 days, to September 26, 2023, in which to file their response to Defendants' Joint Motion to Compel Individual Arbitration, Dismiss Plaintiffs' Class Claims, and Stay All Proceedings, or Alternatively To Transfer Venue Under 28 U.S.C. § 1404, Doc. 69 ("Joint Motion to Compel Arbitration"); to file their response to Defendants' Joint Motion to Dismiss, Doc. 70; and to file their First Amended Complaint as of right under Rule 15(a)(1)(B) of the Federal Rules of Civil Procedure. In support, Plaintiffs state as follows:

On August 14, 2023, Defendants filed their Joint Motion to Compel Arbitration and Joint Motion to Dismiss. Docs. 69, 70. Plaintiffs' responses to both these motions are currently due on September 5, 2023. Docs. 71, 72. In connection with the preparation of their responses to these two motions, Plaintiffs are also likely to file a First Amended Complaint as of right, pursuant to

Rule 15(a)(1)(B) of the Federal Rules of Civil Procedure, which is also currently due 21 days after service of the Joint Motion to Dismiss, *i.e.*, September 5, 2023. Due to the length and complexity of the motions and the preparation of the amended pleading, and the significant press of additional business, Plaintiffs respectfully request an extension of 21 days, to September 26, 2023, in which to file their responses to the Joint Motion to Compel Arbitration and to their Joint Motion to Dismiss, Docs. 69, 70, and in which to file their First Amended Complaint as of right under Rule 15(a)(1)(B). Plaintiffs have consulted with counsel for Defendants about this request for extension, and Defendants have consented to this request.

CONCLUSION

For these reasons, Plaintiffs respectfully request that this Court grant them an extension of time of 21 days, to September 26, 2023, in which to file their Response to Defendants' Joint Motion to Compel Arbitration, Doc. 69; to file their Response to Defendants' Joint Motion to Dismiss, Doc. 70; and to file their First Amended Complaint as of right under Rule 15(a)(1)(B).

Dated: August 29, 2023

Respectfully submitted,

<p>AMERICA FIRST LEGAL</p> <p><u>/s/ Gene P. Hamilton</u> Gene P. Hamilton, GA Bar No. 516201* Reed D. Rubinstein, DC Bar No. 400153* Nicholas R. Barry, TN Bar No. 031963* Michael Ding, DC Bar No. 1027252* Juli Z. Haller, DC Bar No. 466921* James K. Rogers, AZ Bar No. 027287* Andrew J. Block, VA Bar No. 91537* 611 Pennsylvania Ave SE #231 Washington, DC 20003 (202) 964-3721 gene.hamilton@aflegal.org reed.rubinstein@aflegal.org nicholas.bary@aflegal.org michael.ding@aflegal.org juli.haller@aflegal.org james.rogers@aflegal.org andrew.block@aflegal.org</p>	<p>JAMES OTIS LAW GROUP, LLC</p> <p><u>/s/ D. John Sauer</u> D. John Sauer, Mo. Bar No. 58721* Justin D. Smith, Mo. Bar No. 63253* 13321 North Outer Forty Road, Suite 300 St. Louis, Missouri 63017 (314) 562-0031 John.Sauer@james-otis.com</p> <p>* admitted <i>pro hac vice</i></p> <p>LANGLEY & PARKS, LLC</p> <p>By: <u>/s/ Julianna P. Parks</u> Julianna P. Parks, Bar Roll No. 30658 4444 Viking Drive, Suite100 Bossier City, Louisiana 71111 (318) 383-6422 Telephone (318) 383-6405 Telefax jparks@languelparks.com</p>
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CERTIFICATE OF SERVICE

I hereby certify that, on August 29, 2023, I caused a true and correct copy of the foregoing to be filed by the Court's electronic filing system, to be served by operation of the Court's electronic filing system on counsel for all parties who have entered in the case.

/s/ D. John Sauer